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2 **UNITED STATES DISTRICT COURT**
3 **WESTERN DISTRICT OF WASHINGTON**
4 **AT SEATTLE**

5 PRASANNA SANKARANARAYANAN,)

Case No.: 2:24-cv-01745-RAJ

6 Petitioner,)

7 vs.)

PETITIONER'S WITNESS LIST

8 DHIVYA SASHIDHAR,)

9 Respondent.)
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12 **The Convention on the Civil Aspects of International Child Abduction, done at The Hague**
13 **on October 25, 1980; International Child Abduction Remedies Act, 22 U.S.C. 9001 *et seq.***

14 Petitioner, Prasanna Sankaranarayanan ("Petitioner"), by and through his undersigned
15 counsel, hereby submits the following preliminary list of fact and expert witnesses that Petitioner
16 expects to call or may call at trial as part of its case in chief, in connection with the trial schedule
17 starting on January 6, 2025, in the above-captioned matter.

18 Petitioner reserves all rights to amend and/or supplement this disclosure for any reason,
19 including without limitation, in response to Respondent's Exhibit list and Witness list, to respond
20 to or rebut any argument or factual allegation made by Respondent or his witnesses, to impeach a
21 witness, or to cure an inadvertent omission. Petitioner further reserves the right to amend these
22 disclosures in light of Respondent's supplemental production.
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24 1. Petitioner, Prasanna Sankaranarayanan

25 Prasanna Sankaranarayanan will testify with regard to all facts set forth in his Verified
26 Petition for Return of the Child to Singapore (ECF No. 1) and all relevant averments made in the
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Respondent's Answer (ECF No. 23). Mr. Sankaranarayanan will be testifying remotely and the estimated length of testimony, including both direct and cross-examination, is three hours.

2. Respondent, Dhivya Sashidhar

Ms. Sashidhar can testify to the facts set forth in Petitioner's Verified Petition for Return of the Child to Singapore and all facts and statements made in her Answer (ECF No. 23). We anticipate that Ms. Sashidhar will be testifying in-person, and her cross-examination is expected to last approximately three hours.

3. Peter Favaro

Dr. Favaro is designated as an expert witness for the Petitioner. He is expected to testify with regard to his expert opinion concerning the psychological state of A.S. should he be returned to Singapore and the independence of any opinion expressed by the Child, including all opinions set forth in his Rebuttal Expert Report, and concerning any testimony or opinions proffered by Respondent's witnesses at the hearing concerning the Child's psychological risk or independence from parental influence. Dr. Favaro will be testifying in-person and the estimated length of testimony, including both direct and cross examination, is three hours.

4. Kay Lee Lian

Ms. Lian is designated as an expert witness for the Petitioner. She is expected to provide expert testimony regarding Singapore law and the availability of ameliorative measures in Singapore, as well as to address any testimony or opinions presented by the Respondent's witnesses at the hearing on these matters. Ms. Lian will testify remotely, and the estimated length of testimony, including both direct and cross-examination, is two hours.

5. Deborah Day

Dr. Day is designated as an expert witness for the Petitioner. She is expected to provide expert testimony on her rebuttal of Dr. Poppleton's Expert Report, opinions set forth in her Rebuttal Expert Report, and provide expert testimony concerning any testimony or opinions

1 proffered by Respondent's witnesses. Dr. Day will be testifying in-person and the estimated length
2 of testimony, including both direct and cross examination, is two hours.

3 6. Any individual identified by Respondent and not objected to by Petitioner; and,

4 7. Any individual necessary for rebuttal.

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6 Date: January 3, 2025.

7 Respectfully submitted,

8 /s/Roni Ordell

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